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7 Washoe County School District

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 TRINA OLSEN,

11 Plaintiff,

12 vs.

13 WASHOE COUNTY SCHOOL
DISTRICT, a political subdivision of the
14 State of Nevada; Washoe County School
District Superintendent TRACI DAVIS;
15 and DOES 1 through 10, inclusive,

16 Defendants.

Case No.: 3:19-cv-00665-MMD-WGC

STIPLUATION AND ORDER TO
CONTINUE DISCOVERY
DEADLINES

(FIRST REQUEST)

17 Plaintiff TRINA OLSEN, Defendant WASHOE COUNTY SCHOOL DISTRICT,
18 and Defendant TRACI DAVIS hereby stipulate and agree as follows:

19 In light of the societal adjustments caused by COVID-19, the Washoe County
20 School District's physical office has closed. Although administrators and staff continue to
21 work remotely, they are currently focused on implementing a way to continue to educate
22 the WCSD's students remotely and developing appropriate lesson plans for the same.
23 Consequently, at this moment, WCSD does not have the resources to attend immediately
24 to written discovery requests or make certain individuals available for depositions without
25 distracting significantly from this purpose. As a result, the parties hereto agree extend the
26 discovery cut-off and associated deadlines by sixty (60) days as follows:

1 1. Discovery Cut-Off Date:

2 All discovery shall be completed by Monday, July 13, 2020.

3 2. Dispositive Motions:

4 The parties shall file dispositive motions not more than thirty (30) days after the
5 discovery cut-off date and, therefore not later than Wednesday, August 12, 2020.

6 3. Pretrial Order:

7 If no dispositive motions are filed, and unless otherwise ordered by the Court, the
8 Joint Pretrial Order shall be filed not more than thirty (30) days after the date set for filing
9 dispositive motions and, therefore, not later than Friday, September 11, 2020. In the event
10 dispositive motions are filed, the last day to file the Joint Pretrial Order shall be suspended
11 until thirty (30) days after the ruling on the dispositive motions.

12 4. Interim Status Reports:

13 In accordance with Local Rule 26-3, an Interim Status Report will be filed by the
14 parties with the Court sixty (60) days prior to the discovery cut-off date, and therefore, not
15 later than Thursday, May 14, 2020.

16 In addition, the parties stipulate that depositions may be taken by video if the
17 noticing party requests.

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1 This stipulation has been brought no later than twenty-one days prior to the
2 discovery cut-off date in accordance with Local Rule 26-4, and is not made for any
3 improper purpose.

4 IT IS SO STIPULATED.

5 Dated this 27th day of March, 2020.

Dated this 27th day of March, 2020.

6 LUKE ANDREW BUSBY, LTD.

DOTSON LAW

7 
LUKE A. BUSBY, ESQ.

/s/ JUSTIN C. VANCE

ROBERT A. DOTSON, ESQ.

8 Nevada State Bar No. 10319

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9 316 California Ave., #82

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Counsel for Plaintiff

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Reno, NV 89511

Counsel for Defendant,

Washoe County School District

12 Dated this 27th day of March, 2020.

13 THORNDAL, ARMOSTRONG, DELK,
14 BALKENBUSH & EISINGER

15 /s/ KATHERINE F. PARKS

KATHERINE F. PARKS, ESQ.

16 Nevada State Bar No. 6227

6950 S. McCarran Blvd., Ste. B

17 Reno, NV 89509

Counsel for Defendant, Traci Davis

19 IT IS SO ORDERED.

20
21 UNITED STATES DISTRICT COURT JUDGE

22 DATED: _____
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